

ROBERT M. DRASKOVICH, ESQ.
Nevada Bar No. 6275
815 South Casino Center Blvd.
Las Vegas, Nevada 89101-6718
702-474-4222
Attorney for Defendant
emagana@draskovich.com
robert@draskovich.com

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No.: 2:16-CR-00200-JCM-PAL
Plaintiff,)	
)	
)	<u>STIPULATION TO CONTINUE</u>
vs.)	<u>SENTENCING HEARING</u>
)	(Fourth Request)
)	
)	
ASHLEY ZAMBUTO,)	
Defendant.)	
)	

Defendant, Ashley Zambuto, by and through her attorney of record, Robert M. Draskovich, Esq., and Plaintiff United States of America, by and through DAYLE ELIESON, United States Attorney, and Daniel Cowhig, Assistant United States Attorney, stipulate and request that the Court continue her sentencing hearing, currently scheduled for May 7, 2018, until September of 2018 or to a date convenient for the Court. The government's investigation into related criminal activity by others is ongoing. The instant case is related to USA v Boyar, et al. A trial date is currently set in June of 2018.

Accordingly, in the view of the government and the defendant, this case is not ripe for sentencing. Defendant Zambuto is not in custody, and specifically requests this continuance. Defendant Zambuto is in compliance with her release conditions. Defendant Zambuto waives any right she may have to a speedy sentencing in this matter.

WHEREFORE, the parties stipulate and request that the Court continue defendant Zambuto's sentencing hearing, currently scheduled for May 7, 2018, until September of 2018 or to a date convenient for the Court.

RESPECTFULLY SUBMITTED this 27th day of March, 2018.

/s/ Daniel Cowhig
DANIEL COWHIG
Assistant United States Attorney

By: /s/ Robert M. Draskovich, Esq.
ROBERT M. DRASKOVICH, Esq.
Counsel for defendant Zambuto

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IT IS SO ORDERED March 29, 2018.

James C. Mahan
UNITED STATES DISTRICT JUDGE

/s/ Robert M. Draskovich

ROBERT M. DRASKOVICH, ESQ.
Nevada Bar No. 6275
Attorney for Defendant Zambuto